Radiological Associates of Sacramento
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Sacramento, CA 95815

Departmento of Health & Human Services
Centers for Medicare & Medicaid Services
Room 352-G
200 Independence Ave., SW
Washington, DC 20201

Dear Sirs:

I strongly support the request to remove the current prospective data collection requirements for certain cancers in Section 220.6 of the National Coverage Determination Manual, and to extend coverage for PET across all oncologic indications.

There are over 200 types of cancer. Hundreds of studies over the past two decades have shown the utility of PET in diagnosis, staging, and restaging/suspected recurrence in many more types of cancer than the 9 cancers currently covered. The NOPR report on the clinical impact of 22,975 PET or PET/CT studies showed a 36.5% change in the decision to treat or not treat, and 74% change in overall management decisions.

One of the cancer types in the NOPR report was bladder cancer (1,615 PET or PET/CT studies representing 7% of the total studies reported). An estimated 67,160 new cases of urinary bladder cancer will be diagnosed in the United States in 2007, making the disease the fourth most common cancer in men and the ninth most common cancer in women (1).

The high accuracy and clinical utility of PET in this group of patients was reported in a paper published in 2006 (2). In February 2008, investigators from the University of

Southern California published another report demonstrating the high clinical impact of PET and PET/CT (3).

Based on the published literature and personal professional experience with PET and PET/CT since 1995 in many different types of cancer, I ask CMS to grant the request of the applicants.

1. Jemal A, Siegel R, Ward E, et al. Cancer statistics, 2007. CA Cancer J Clin 2007;57:43-66.

2. Liu IJ, Lai YH, Espiritu JI, Segall GM, Srinivas S, Nino-Murcia M, Terris MK. Evaluation of fluorodeoxyglucose positron emission tomography imaging in metastatic transitional cell carcinoma with and without prior chemotherapy. Urol Int. 2006;77(1):69-75.

3. Jadvar H, Quan V, Henderson RW, Conti PS. [F-18]-Fluorodeoxyglucose PET and PET-CT in diagnostic imaging evaluation of locally recurrent and metastatic bladder transitional cell carcinoma. Int J Clin Oncol. 2008 Feb;13(1):42-7.

Sincerely,

Richard W. Myers, M.D.
Chair, Division of Nuclear Medicine